IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

ML FASHION, LLC, and ML RETAIL, LLC,)	
Plaintiffs,)	Case No. 1:20-cv-05124
v.)	
)	Judge Steven C. Seeger
NOBELLE, STEPHANIE MENKIN, SARIT)	
MAMAN NAGRANI, and NICOLAS)	
GOUREAU,)	
)	
Defendants.)	

DEFENDANTS' MOTION TO DISMISS THE COMPLAINT

Defendants Nobelle GW LLC (erroneously sued as Nobelle), Stephanie Menkin, Sarit Maman Nagrani, and Nicolas Goureau (collectively "Defendants"), through their undersigned counsel, do hereby move the Court, pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6), for an order dismissing Plaintiffs ML Fashion, LLC and ML Retail LLC's claims, with prejudice and as against all Defendants, as well as granting such other and further relief as the Court may deem just and proper.

This Motion is based upon this Motion, the Defendants' Memorandum of Law in Support of Their Motion to Dismiss the Complaint, the Affidavits of Sarit Maman Nagrani, on her own behalf and on behalf of Nobelle, Stephanie Menkin and Nicolas Goureau in Support of Defendants' Motion to Dismiss the Complaint, the records and files of this Court, any other matter of which the Court may take judicial notice, and upon such other and further oral or documentary evidence as may be presented to the Court at or prior to the hearing on this Motion.

Dated: October 26, 2020 /s/ Elizabeth L. Janczak

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ML FASHION, LLC, and ML RETAIL,

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Case No. 1:20-cv-05124

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Hon. Steven C. Seeger

NOBELLE, STEPHANIE MENKIN, SARIT MAMAN NAGRANI, and NICOLAS GOUREAU,

Defendants.

CERTIFICATE OF SERVICE

I, Elizabeth L. Janczak, an attorney, hereby certify that on October 26, 2020, I caused a true and correct copy of *Defendants' 'Motion to Dismiss Complaint*, to be filed with the Court and served upon the following parties by the manner listed.

/s/ Elizabeth L. Janczak

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